

RESPONSE OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO OFFICIAL COMMITTEE OF TORT CLAIMANTS' MOTION FOR REIMBURSEMENT OF MEMBER EXPENSES (DKT. No. 813)

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**RESPONSE OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO MOTION OF
OFFICIAL COMMITTEE OF TORT
CLAIMANTS PURSUANT TO 11 U.S.C. §§
503(b)(3)(f) AND 105(a) TO ESTABLISH
PROCEDURES FOR REIMBURSEMENT OF
EXPENSES OF TORT COMMITTEE
MEMBERS [Dkt No. 813]**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: April 9, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court,
Courtroom 17, 16th Floor
450 Golden Gate Avenue,
San Francisco, CA 94102

1 The Official Committee of Unsecured Creditors (the "Committee") in the chapter 11 cases of
2 the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") hereby responds
3 (this "Response") to the *Motion of Official Committee of Tort Claimants Pursuant to 11 U.S.C. §§*
4 *503(b)(3)(F) and 105(a) to Establish Procedures for Reimbursement of Expenses of Tort Committee*
5 *Members* (the "Reimbursement Procedures Motion") [Dkt. No. 813].¹

6 **RESPONSE**

7 Pursuant to the Reimbursement Procedures Motion, the Official Committee of Tort Claimants
8 (the "TCC") seeks to establish expedited expense reimbursement procedures in order to facilitate
9 prompt payments to its Members. The Committee supports the reimbursement of reasonable and
10 appropriate expenses for all estate fiduciaries. As such, the Committee has no objection to
11 Reimbursement Procedures Motion, provided that its application be expanded to cover all members
12 of both official committees so that all estate fiduciaries operate under identical procedures. Counsel
13 for the Committee has discussed this matter with counsel for the TCC and understands that the TCC
14 has no objection to their proposed procedures being adopted for both official committees.
15

16 WHEREFORE, for the reasons set forth in the Response, the Committee respectfully requests
17 that the Court enter an order granting the Reimbursement Procedures Motion, as modified to apply
18 to all members of both official committees.
19

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21 DATED: April 1, 2019

/s/ Dennis F. Dunne

Dennis F. Dunne

MILBANK LLP

*Proposed Counsel for the Official Committee
of Unsecured Creditors*

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27 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in
28 the Reimbursement Procedures Motion.